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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Share His Story, Inc.	,)
an Illinois Corporation)
) Case No. 06-cv-2922
Plaintiff,)
) Judge Suzanne Conlon
v.)
) Magistrate Judge Geraldine Soat Brown
Roman, Inc.)
an Illinois Corporation)
)
Defendant.)
)

AGREED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT AND TO RESET STATUS HEARING DATE

Defendant Roman, Inc., by its attorneys, hereby moves this Honorable Court under Fed. R. Civ. P. 6(b), 16, and 26, for an order (1) extending the time to answer, move, or otherwise plead in response to the complaint from June 14, 2006 to July 12, 2006, and (2) resetting the status hearing currently scheduled for June 29, 2006 to July 12 or any date thereafter to be determined by the Court. In support of this motion, Defendant states as follows:

- 1. Pursuant to the service of summons, Defendant Roman, Inc. is required to answer or otherwise plead in response to Plaintiff's Complaint by June 14, 2006.
- 2. On June 5, 2006, this Court entered an order scheduling a status hearing for June 29, 2006.
- 3. On June 6, 2006, Plaintiff's counsel filed a motion to reset the status hearing to any one of a range of later dates due to a scheduling conflict. Plaintiff's counsel will be

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unavailable on June 29; Defendant's counsel will be unavailable on June 29 and July 6.

4. Further, the requested extensions, if granted, would permit the parties to explore

options for settlement before significant expenses are incurred by both parties.

5. Defendant respectfully requests that favorable consideration be given to this

agreed motion to extend time for Defendant to answer or otherwise plead to July 12,

2006, and to reset the status hearing now scheduled for June 29, 2006 to July 12, 2006 or

any date thereafter to be determined by the Court.

6. This motion is brought in good faith, not for purpose of delay, and will not

prejudice any party.

7. On June 9, 2006, Plaintiff, through its counsel, agreed to this motion.

Respectively submitted,

By: _/s/ Louis J. Alex

John L. Alex, Registration No. 0027189 Louis J. Alex, Registration No. 6274458 COOK, ALEX, McFARRON, MANZO,

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Attorneys for Defendant

Dated: June 9, 2006

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CERTIFICATE OF SERVICE

I, Louis J. Alex, an attorney, the undersigned attorney, hereby certify that on the 9th day of June, 2006, I served copies of the following documents upon counsel of record by the following means as indicated below:

- 1. Notice of Agreed Motion
- 2. Agreed Motion to Extend Time to Answer or Otherwise Plead in Response to Plaintiff's Complaint and to Reset Status Hearing Date

by ECF to the following:

Mark E. Wiemelt (<u>mark@wiemeltlaw.com</u>)

/s/ Louis J. Alex Louis J. Alex